

AGNIFILO INTRATER

July 8, 2025

BY ECF

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

The parties have met and conferred and have agreed to the following schedules for sentencing, post-verdict motions and submission of offense conduct to the Probation Office:

For sentencing, the parties propose the Court's original date of October 3, 2025. The defense proposes that the Probation Office provide the parties with a Pre-Sentence Investigation Report ("PSR") on or before August 29, 2025; that the defense objections to the PSR be filed on or before September 5, 2025; that the Government objections to the PSR be filed on or before September 12, 2025; that the Probation Office disclose their final PSR on September 18, 2025; that the defense's sentencing memorandum be filed on or before September 19, 2025; and that the Government's sentencing memorandum be filed on September 26, 2025. The Government and the Probation Office do not object to this schedule.

For post-verdict motions, the parties propose that the defense file any post-verdict motions on or before July 30, 2025 and that the Government respond on or before August 20, 2025.

Finally, the Government requests that it be permitted to submit its summary of offense conduct on or before July 11, 2025, and the defense does not object. We appreciate the Court's consideration.

Respectfully submitted,



Marc Agnifilo

cc: All counsel (by ECF)